

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

<b>HULL’S ENVIRONMENTAL SERVICES, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>CIV-24-479-JAR</b>
<b>UNITED STATES OF AMERICA, ex rel</b>	)	
<b>SECRETARY OF ARMY / U.S. ARMY</b>	)	
<b>CORPS OF ENGINEERS; et al.</b>	)	
	)	
<b>Defendant(s).</b>	)	

**MOTION TO LIFT STAY**

**COMES NOW** the Plaintiff above named Hull’s Environmental Service, Inc., and hereby moves the Court to lift the stay entered by this Court by Minute Order on March 24, 2025. In support hereof, the Plaintiff sets forth the following, to-wit:

1. This Court entered an order on March 24, 2025, pursuant to which this Court “stayed,” the proceedings herein pending “Automatic Stay of Proceedings filed by Defendant Marina Del Rey, LLC.”

2. This Court order was entered pursuant to a Suggestion of Bankruptcy and Notice of Automatic Stay of Proceedings filed herein on March 18, 2025, by Marina Del Rey, LLC, being Document 32 filed herein. Pursuant to the Suggestion of Bankruptcy, Marina Del Rey, LLC, advised the Court that a voluntary bankruptcy petition had been filed in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, being Case No. 25-30909-11, which the Suggestion of Bankruptcy advised that the petition was filed on March 17, 2025.

3. This bankruptcy case referred to in the Suggestion of Bankruptcy, being Case No. 25-30909-11 was dismissed by the United States Bankruptcy Court for the Northern District of

Texas, Dallas Division, on April 4, 2025, a copy of which is attached hereto as Exhibit “A” and incorporated herein by reference.

4. 11 U.S.C. §362(C)(2)(b) provides that “the stay of any action under (a) of this section continues until the earliest of (B) the time the case is dismissed.” U.S.C. 11 §362 is the basic automatic stay statute of the Bankruptcy Code, which therefore provides, as set forth, that the stay does not continue after the case has been dismissed. This case was dismissed on April 4, 2025, as set forth.

5. This Court entered a stay herein on March 24, 2025, and held in abeyance certain motions pending herein and declared “moot,” an extension of time to answer by Marina Del Rey, LLC. The Plaintiff therefore moves the Court to lift the stay and to proceed with all matters pending herein.

**WHEREFORE**, premises considered, the Plaintiff moves the Court to lift the stay entered herein on March 24, 2025, for the reason that the bankruptcy filed by the Defendant, Marina Del Rey, LLC, referenced above, was dismissed on April 4, 2025, which was the basis for the stay herein, and the Plaintiff further moves the Court to enter such other and further relief as this Court may deem just and equitable.

**MORDY, MORDY, PFREHM & WILSON, P.C.**

*s/Carrie Pfrehm*

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***Attorneys for Plaintiff, Hull’s Environmental  
Services, Inc.***

**CERTIFICATE OF SERVICE**

I, Carrie Pfrehm, hereby certify that on the 17<sup>th</sup> day of April 2025, a true and correct copy of the above Motion to Lift Stay was electronically served on all interested parties using the Courts CM/ECF system

By: s/Carrie Pfrehm